

**UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Kelli L. Lowrey	:	
Debtors	:	
	:	Case No.: 19-15023 PMM
Nationstar Mortgage LLC d/b/a	:	Chapter 13
Mr. Cooper	:	
	:	
Movant	:	
v.	:	11 U.S.C. 362
Kelli L. Lowrey	:	
Respondents	:	

ANSWER TO A MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW comes the Debtor, by his Attorney **Thomas W. Fleckenstein** and files the within **Answer to the Motion for Relief from the Automatic Stay**:

1.-5. ADMITTED.

6.-9. DENIED. Strict proof of this allegation is demanded at time of trial.

WHEREFORE, the Debtor herein, respectfully prays that this Honorable Court deny the Motion for Relief from the Automatic Stay.

RESPECTFULLY SUBMITTED:

DATE: February 14, 2022

/s/ Thomas W. Fleckenstein
Thomas W. Fleckenstein, ESQUIRE
Attorney I.D. No. 307390
470 Locust Street
Columbia, PA 17512
(717) 333-4053